Attachment 2

EDF-ER-178, Revision 3, WAG 5 OU-12 Phase II Remedial Action Soil Minimization Strategy

Document ID: EDF-ER-178

INEEL/EXT-2000-00527

Revision ID: 3 Effective Date: 04/11/03

Engineering Design File

PROJECT NO. 23366

WAG 5 OU 5-12 Phase II Remedial Action Soil Volume Minimization Strategy

Prepared for: U.S. Department of Energy Idaho Operations Office Idaho Falls, Idaho



ENGINEERING DESIGN FILE

23366 4/11/03

ED	F No.:	EDF-	ER-17	8	EDF Rev.	No.: <u>I</u>	Rev. 3	Project File No.: <u>O</u>	Ú 5-12	Pho	ase II
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ACRONYMS

AA atomic absorption

ARA Auxiliary Reactor Area

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

D&D decontamination and dismantlement

DOE-ID U.S. Department of Energy Idaho Operations Office

GPRS Global Positioning Radiometric Scanner

HPGe high-purity germanium

ICDF INEEL CERCLA Disposal Facility

INEEL Idaho National Engineering and Environmental Laboratory

OU operable unit

PBF Power Burst Facility

RCRA Resource Conservation and Recovery Act

RD/RA remedial design/remedial action

RFI Request for Information

ROD record of decision

SPERT-II Special Power Excursion Reactor Test No. 2

VE value engineering

WAG waste area group

XRF x-ray fluorescence

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WAG 5 OU 5-12 Phase II Remedial Action Soil Volume Minimization Strategy

1. ISSUE

A large volume, estimated at 27,105 m³ (35,452 yd³), of contaminated soil and rocks at three Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites within the Auxiliary Reactor Area (ARA) have been identified for removal and subsequent disposal at the proposed Idaho National Engineering and Environmental Laboratory (INEEL) CERCLA Disposal Facility (ICDF). Specifically, these sites are the ARA-I Chemical Evaporation Pond (ARA-01), the ARA-III Radioactive Waste Leach Pond (ARA-12), and ARA-I and ARA-II Radiologically Contaminated Soils (ARA-23).

The Waste Area Group (WAG) 5 team identified early in the remedial design/remedial action (RD/RA) process that the amount of soil requiring disposal must be minimized in order to minimize costs and reduce the total volume of soils disposed at the ICDF. Additionally, the State of Idaho Department of Environmental Quality noted with the signature of the Record of Decision (ROD) that U.S. Department of Energy (DOE) minimize the volume of soils from ARA-23 that are sent to ICDF. Therefore, the RD/RA process for the three contaminated soil sites addressed in the Operable Unit (OU) 5-12 ROD will incorporate methods, as discussed below, for minimizing the amount of soil material requiring disposal.

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2. BACKGROUND AND ASSUMPTIONS

The OU 5-12 remedial investigation and baseline risk assessment identified contaminants that pose unacceptable human health and/or ecological risks at the three CERCLA sites within the ARA. The estimated volumes of contaminated soils for each site are based on conservative assumptions. The following table lists the contaminants of concern for each site, the respective remedial action goals, and the estimated soil volume identified in the OU 5-12 ROD (DOE-ID 2000). These volumes have subsequently been modified based upon improved data as discussed in Appendices F and O of the OU 5-12 Phase II work plan (DOE-ID 2003).

Table 2-1. Operable Unit 5-12 contaminated soil sites.

Site	Contaminant of Concern	Remedial Action Goal	Estimated Contaminated Soil Volume (m³)	Estimated Contaminated Soil Volume (yd³)
ARA-01	Arsenic Selenium	10 mg/kg 2.2 mg/kg		2,382
	Thallium	4.3 mg/kg	1,821	
ARA-12	Ag-108m Copper Mercury Selenium	0.75 pCi/g 220 mg/kg 0.5 mg/kg 2.2 mg/kg	1,503	1,998
ARA-23	Cs-137	23 pCi/g	35,538	46,481
TOTAL VOLUME	C5-137	25 pc//g	38,862	50,861

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3. VOLUME MINIMIZATION STRATEGY

3.1 Overview

An estimated total volume of 27,105 m³ (35,452 yd³) of contaminated soil will require removal and subsequent disposal at the ICDF, with the soils from ARA-23 comprising 93% of the total volume. The WAG 5 project team has identified methods that may be employed to minimize the volume of soil that will be disposed, thereby minimizing the amount of soil with contaminant concentrations less than the remedial action goals that is excavated and dispositioned at the ICDF. The four elements of the volume minimization strategy include (1) procurement approach, (2) utilization of site characterization data, (3) optimization of field technologies and excavation methods, and (4) handling and dispositioning of large rocks. The strategy will be flexible enough to incorporate new technologies for field measurements and excavation methods that may arise between now and the time the remedial action begins in 2003.

3.2 Procurement Approach

The objective of this method is to define and develop a procurement approach and contract structure that provides for minimization of soil volume. Typically, a contract is awarded on the volume of soil removed. In this case, the reward should reflect removing the minimum amount of soil for disposal. The preferred procurement strategy will include a clear description of the work to be performed, a process to minimize the soil removal, a request for input from the contracting community, and a pre-bid walk through. A value engineering (VE) session was held March 8, 2000, to discuss the soil minimization strategies and to formulate a procurement approach for the WAG 5 Phase II remedial action. The following is a partial list of the procurement items addressed during the VE session:

- Develop white paper stating the objectives of the work
- Define a "how-to" process (excavation plan) to minimize the soil removed
- Determine Davis-Bacon/Make-Buy decision
- Issue the Request for Information (RFI), asking for contractor input on minimizing the volume removed
- Provide incentives in the contract for excellent safety record during project execution, and/or early finish bonus
- Perform a pre-bid walk-through and data review with the contractors
- Identify acceptable and excluded equipment
- Produce List of Unknowns
- Define how the quantity of soil removed will be measured
- Define what work, if any, will be performed in-house
- Handle vegetation

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- Handle large rocks
- Define equipment needs
- Define required contractor capabilities
- Complete a boiler-plate procurement package by December 2000
- Define the excavation and field screening sequence between the sites
- Evaluate hot spots after contractor removes 7.6 cm (3 in.) of soil.

Five strategies for contracting the excavation were presented and discussed during the VE session. The conclusions of the meeting resulted in a Contractor Package Approach. The preferred approach would be to bid as separate line items: (1) the removal of the top 7.6 cm (3 in.) of soil and (2) the remediation of the hot spots that were detected after the initial excavation. Considerations must be made for standby and downtime due to adverse weather conditions, equipment failure, and ICDF hours of operation, as well as working conditions if the soil is too wet or too dry. Sequencing of the excavations to optimize the use of equipment and resources will be finalized at a later date; however, a proposed sequence is presented below in Section 3.10.

3.3 Soil Removal Approach

As stated earlier, approximately 93% of the estimated WAG 5 soil volume is located at ARA-23; however, the opportunity exists at all of the contaminated soil sites for minimizing the amount of clean soil that is excavated and disposed at the ICDF. A generic approach for contaminated soil removal is to use existing characterization data to define the lateral and vertical bounds of the initial excavation at each site. The area to be excavated will be surveyed and marked, and vegetation will be mowed, removed, and dispositioned with the soils. Excavation of soils will proceed using the appropriate equipment, most likely an all-wheel-drive motor grader. Although most of the contamination in the soil resides in the top 2.5 cm (1 in.) (i.e., Cs-137 at ARA-23), limitations in the equipment and the uneven terrain make it necessary to remove the top 7.6 cm (3 in.). Field screening methods may then be employed to identify any remaining hot spot contamination. Depending upon the size of the hot spot(s), appropriate equipment such as a frontend loader, backhoe, or hand shovel may be used to remove the contaminated material. Field screening methods will again be employed to verify hot spot removal. An iterative process of excavation followed by field screening will be used to selectively remove only contaminated soil that exceeds the remedial action goal(s). The nature and extent of contamination for each contaminant of concern varies for each site; therefore, the number of iterations of hot spot identification and selective excavation may also vary by site. Upon completion of the excavations, final surveys and verification sampling will occur to demonstrate that the site is clean and the remedial action goals have been achieved. Due to the shallow distribution of the surface soils in some locations, the basalt may be exposed. If residual contamination above the remedial action goals remains on the basalt, simplistic methods will be employed (i.e., vacuuming, sweeping) to remove the contamination from the surface or near-surface interstices of the basalt. If decontamination efforts are unsuccessful, then appropriate institutional controls will be implemented at any site where contaminants of concern remain at levels that prevent unrestricted and unlimited use of the site.

A brief discussion is warranted of the role of field screening compared to the final closure survey. Field screening will be used to make decisions in the field as to whether or not further excavation is

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warranted (i.e., hot spot contamination). Typically, final status (i.e., the site is clean) will be based on confirmation samples and final status survey data. To the extent practical, in situ field measurements will be used to support the final status decision for each site. The proposed soil removal process, field screening methods and final status surveys for each site are outlined in the following sections. The field screening methods and instrumentation discussed in the following sections refer to state-of-the-art technologies that are currently in use at the INEEL; however, if more sensitive, versatile, and accurate technologies become available by 2003, they will be evaluated against the project objectives. If the new instrumentation meets project objectives, then it will be incorporated into the field screening and final status surveys.

3.4 ARA-01

The ARA-01 Chemical Evaporation Pond will be remediated to address the risk to human and ecological receptors posed by contaminated soil. The ARA-01 site, shown in Figure 3-1, is a shallow, unlined surface impoundment, roughly 30.5×91.4 m (100×300 ft), that was used from 1970 to 1988 to dispose of laboratory wastewater from the ARA-I Shop and Maintenance building (ARA-627). Process wastes contained small quantities of radioactive substances, acids, bases, and volatile organic compounds. Surface sediments in the pond area are shallow, with a maximum thickness of 1 m (3.5 ft) and an average thickness of 0.5 m (1.5 ft). Laterally, the contamination is contained within the bounds of the pond area. Vertically, the contamination is limited to the surficial sediments as evidenced by the results of borehole logging and soil sample analyses (DOE-ID 2000). As shown in Table 2-1, the contaminants retained during the risk assessment are arsenic, selenium, and thallium, with the highest concentrations found adjacent to the pond inlet in the northern corner of the pond.

The initial removal of soil at ARA-01 will involve excavating the top 7.6 cm (3 in.) over the entire pond surface. Field screening samples will then be collected from the newly exposed soil in the pond area based on a systematic grid to identify potential hot spots. Based on historical and characterization data, hot spots are anticipated near the pond inlet where contamination could extend to the soil/basalt interface; therefore, biased samples will also be taken adjacent to the pond inlet. All samples will be analyzed for arsenic, selenium, and thallium using an on-site, laboratory-grade, x-ray fluorescence (XRF) spectrometer. Method detection limits of the XRF spectrometer for arsenic, selenium, and thallium are 0.6, 0.6, and 1.7 mg/kg, respectively. Based on the results of the field screening samples, further excavation will be performed in the identified hot spots until all contamination above the remedial action goals is removed, as demonstrated by field screening measurements, or until the basalt interface is exposed. Final status survey samples will then be collected from the area on a random grid to demonstrate, with 95% confidence, that the ARA-01 pond area soils do not contain residual contamination at or above the remedial action goals.

3.5 ARA-12

Remedial action is required for the ARA-12 Radioactive Waste Leach Pond to address the risk to human and ecological receptors posed by contaminated soil. The ARA-12 site, shown in Figure 3-2, is a shallow, unlined surface impoundment approximately 50×115 m (164×377 ft). Surface sediments are relatively shallow in the pond area, with an estimated average depth of 2.1 m (7 ft). The leach pond received low-level radioactive effluent from the reactor research operations at the ARA-III facility from 1959 to 1965. Investigations at the site show elevated levels of Ag-108m, copper, mercury, and selenium that pose unacceptable risk to future residents and ecological receptors. Silver-108m is the only contaminant of concern that poses a human health risk, while the copper, mercury, and selenium pose ecological risks. The lateral extent of the Ag-108m contamination at 0.75 pCi/g and greater is depicted by

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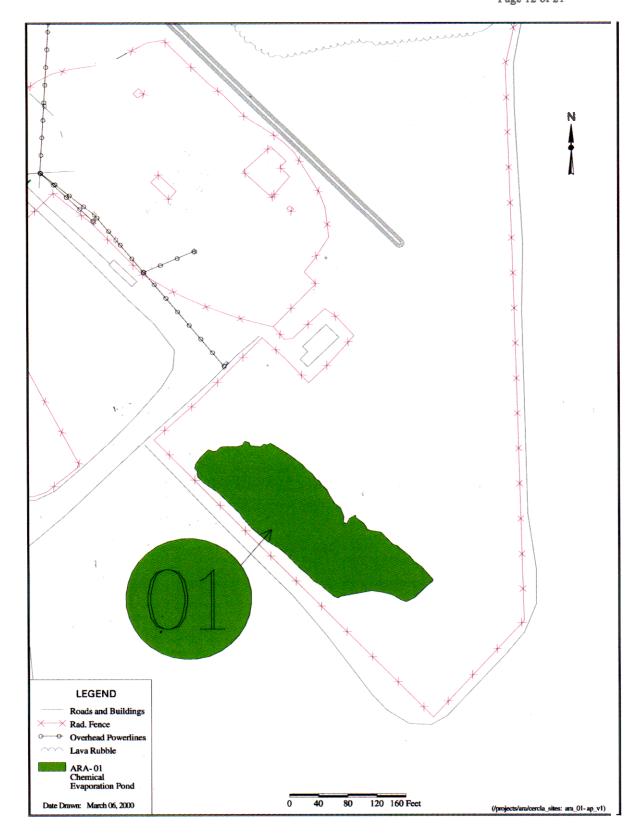


Figure 3-1. ARA-01 site, estimated lateral extent of contamination.

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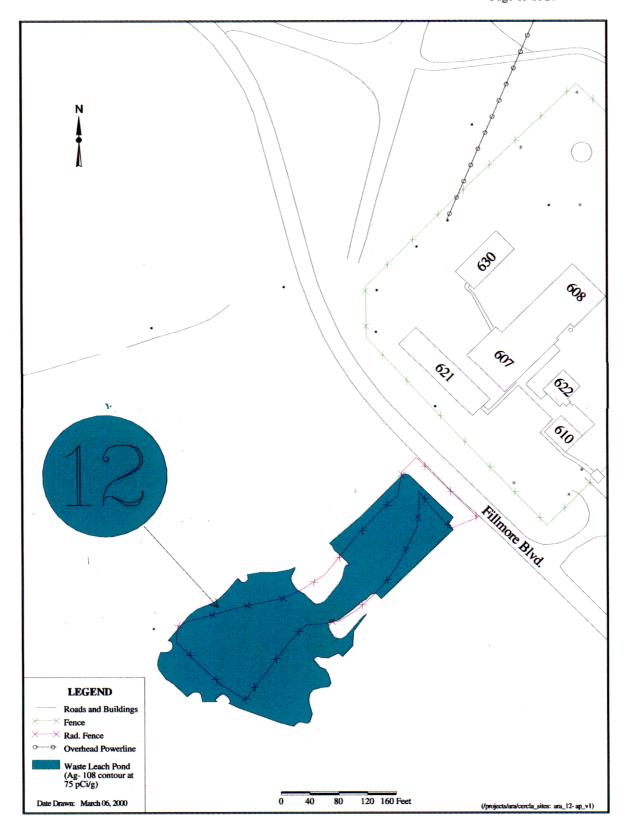


Figure 3-2. ARA-12 site, estimated lateral extent of Ag-108m contamination.

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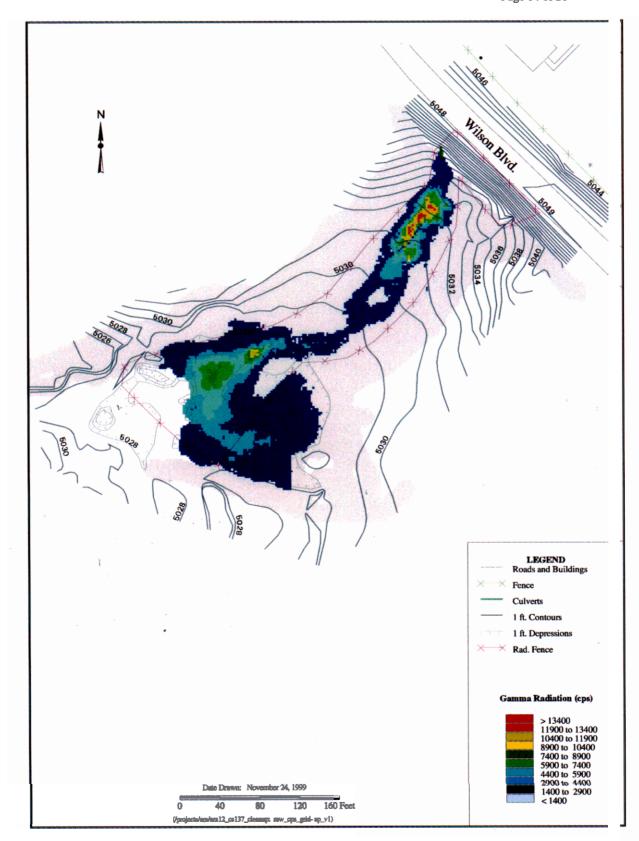


Figure 3-3. ARA-12 gross gamma radiological survey.

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the shaded area in Figure 3-2. A gross gamma radiological survey performed in 1999 shows the relative levels of radioactivity in the pond soils, as illustrated in Figure 3-3. Historical data also show that Ag-108m concentrations exceeding the remedial action goals may extend to the soil/basalt interface in the vicinity of the pond inlet; however, the accuracy of that data is questionable. Review of the Track 2 study data shows that the elevated copper, mercury, and selenium contamination is confined to the surficial soils 0 to 0.15 m (0 to 0.5 ft.) near the pipe inlet and in the pond ditch corresponding to the area of elevated radioactivity in the northeast portion of the pond, as shown in Figure 3-3. Additionally, selenium at 2.7 mg/kg was identified from 0.76 to 0.9 m (2.5 to 3 ft) at a single location on the east bank of the pond area; however, based on review of the Track 2 data limitations and validation report, this value is identified as a non-detect.

The initial removal of soil at ARA-12 will involve excavating the top 7.6 cm (3 in.) over the entire area defined in Figure 3-2. Field screening methods will then be used to identify any remaining hot spots. The excavated area will be surveyed with the Global Positioning Radiometric Scanner (GPRS) to identify radiological hot spots. The GPRS is comprised of two large area plastic radiation detectors and a global positioning system mounted on a four-wheel-drive all-terrain vehicle. The vehicle is driven at a rate no greater than 5 mph, and the computer-controlled data acquisition system collects radiation readings in counts per second along with the associated position. This system provides 100% coverage of the surveyed area to ensure that no hot spots above the remedial action goal are missed. The GRPS survey will also be used for identifying potential locations of elevated copper, mercury, and selenium. Due to the nature of the contaminant deposition, it is assumed, and supported by analytical data, that the copper, mercury, and selenium are co-located with the radiological contamination in the upper 0.15 m (0.5 ft.) of the surficial soils. If a hot spot is identified with the GPRS, then a stationary measurement with a tripod-mounted high-purity germanium (HPGe) spectrometer will be used to positively identify and quantify the contamination contributing to the elevated radiation levels. Additionally, field screening samples will be collected at the center of the hot spot and analyzed for copper and selenium using the laboratory XRF spectrometer and for mercury using the laboratory atomic absorption (AA) spectrometer. Samples will also be collected from a systematic grid and analyzed for copper, selenium, and mercury to identify areas of elevated metal contamination. Method detection limits for the XRF spectrometer are 0.9 and 0.6 mg/kg for copper and selenium, respectively. The method detection limit for the AA spectrometer is 0.04 mg/kg for mercury. The radiological data from the GPRS and the copper, selenium, and mercury data will be used to direct excavation of hot spots. If field screening shows Ag-108m, copper, or selenium above the remedial action goals, then additional excavations will be performed. Based on the results of the field screening, excavation will be performed in the identified hot spots until all contamination above the remedial action goals is removed, as demonstrated by field screening measurements, or until the basalt interface is exposed. Based on the information presented here, if 15 cm (6 in.) or more soil is excavated at ARA-12, then all copper, mercury, and selenium contamination should be removed; however, confirmation sampling for final site closure will provide the final verification. Final status survey samples will then be collected from the area on a random grid to demonstrate, with 95% confidence, that the ARA-12 pond area soils do not contain residual contamination at or above the remedial action goals.

3.6 ARA-23

Remedial action is required for the ARA-23 radiologically contaminated soils to address the risk to human health posed by the Cs-137 contamination in the soils. Investigations at the site show that Cs-137 is the only contaminant that poses an unacceptable risk to hypothetical future residents. ARA-23 is a 42-acre, windblown, contamination area surrounding the ARA-I and ARA-II facilities, as shown in Figure 3-4. The surface sediments vary in thickness across ARA-23 but are generally shallow (<6 m [<20 ft]). The soil was contaminated by the 1961 SL-1 accident and subsequent cleanup. Investigations at

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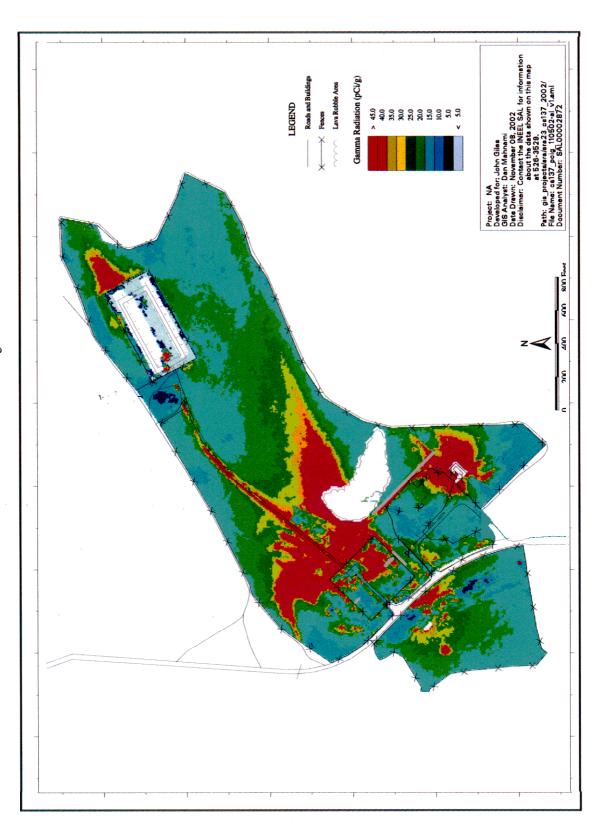


Figure 3-4. ARA-23 site, estimated lateral extent of windblown contamination, and Cs-137 concentrations.

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the site show that most of the Cs-137 contamination is limited to the top 2.5 cm (1 in.) of soil. A small portion, 0.9 acres, of the area is covered with large basalt rocks. These rocks were determined to be contaminated above the 23 pCi/g remedial action goal; however, it is generally accepted that the contamination on the rocks is actually associated with the soil that partially covers the rocks. Dispositioning of the rocks is covered below in Section 3.7.

The initial removal of soil at ARA-23 will involve excavating the top 7.6 cm (3 in.) over the entire area as described in the specifications provided in Appendix B of the OU 5-12 Phase II work plan (DOE-ID 2003). Exceptions to this include the SL-1 haul road corridor and turn-around area, and inside the fence of the ARA-II facilities. The initial excavation of the SL-1 haul road corridor and turn-around area, and the ARA-II facility will remove the top 15 cm (6 in.) of contaminated soil. Contaminated soils will be sent to ICDF, and soils below 23 pCi/g will be used for backfill. The excavated areas will then be surveyed with the GPRS to identify remaining hot spots. The hot spots will then be measured with the aboveground HPGe spectrometer to positively identify and quantify the remaining Cs-137 contamination. Additionally, estimates of the depth distribution of the remaining contamination will be made from the HPGe measurements as described in Appendix O of the OU 5-12 Phase II Work Plan (DOE-ID 2003). This will assist the field personnel in determining how deep to make the next cut of soil. The removal and field screening process at ARA-23 may require multiple iterations before the remedial action goal of 23 pCi/g is achieved. Use of field screening instrumentation will minimize the number of iterations. It will also increase the efficiency of the removal by positively identifying the depth of residual hot spot contamination and directing the aerial and vertical extent of hot spot removal. Due to the vast expanse of the site and the comprehensive nature of the radiological field screening methods, the number of soil samples collected will be minimized by using GPRS data to support the final status survey. Final status survey measurements and a limited number of verification samples will then be collected from the area on a random grid to demonstrate, with 95% confidence that ARA-23 area soils do not contain residual contamination at or above the remedial action goals.

3.7 Handling of Large Rock

A potential area for volume reduction and volume minimization will be in the handling of the large rocks stockpiled from ARA facility construction at ARA-23 that are currently identified as contaminated with Cs-137 above the 23 pCi/g remedial action goal. There are approximately 1,357m³ (1,774 yd³) of contaminated rock located on the surface and readily visible at ARA-23; however, it is generally accepted that the contamination associated with the rock is actually in the soil that partially covers and surrounds the rock. An evaluation was performed to assess the feasibility of decontaminating the rock as opposed to removal and bulk disposal at the ICDF. Two methods of decontamination were addressed in the evaluation:

- Gross decontamination by using a front-end loader with a rock bucket to shake the dirt loose from the rocks
- Gross decontamination by using a stiff bristle brush to loosen the soil and a vacuum to remove the dirt.

The rocks would then be screened using a hand-held sodium iodide detector or other comparable field instrument to verify that the Cs-137 contamination has been removed and that the residual contamination left on the rocks is less than the 23 pCi/g remedial action goal.

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As a result of the evaluation presented in Appendix E of the OU 5-12 Phase II work plan (DOE-ID 2003), it was determined that the preferred alternative to decontaminating the rock is removal and bulk disposal. Because decontamination methods are not feasible, the rock will be removed and disposed at the ICDF. The 1,357 m³ (1,774 yd³) of rock material comprises only 5% of the total estimated WAG 5 volume. It should be noted that the volume of large rock encountered in the excavation of the other CERCLA sites will be excavated and dispositioned with the soils. Rocks uncovered during the excavation have already been included in the soil volume estimate. These rocks will be dispositioned with the soils at the ICDF, and no attempts will be made to sort the rocks from the soil, or decontaminate the rocks.

3.8 Sequencing of Soil Removal

Sequencing of the soil removal is critical to completing the work scope on schedule in a timely and efficient manner. Regardless of whether the soil removal work is let to a subcontractor or is completed inhouse, proper sequencing of the removal is necessary to minimize the amount of idle time, and the amount of waste generated. In general, soil removal at each of the three sites will progress in a manner to minimize the potential spread of contamination from frequent prevailing winds, as well as equipment. As such, soil should be removed from the furthest upwind locations first, and proceed in a downwind direction. The proposed removal scenario is as follows:

- Mobilize equipment to ARA-01 site.
 - Perform initial excavation and field screening at ARA-01, followed by selective excavation based upon field screening results.
 - Field screening will be performed again to verify that residual contamination is below the remedial action goals, followed by confirmation sampling for the final closure survey.
 - Decontaminate equipment.
- Mobilize to ARA-12 site.
 - Perform initial excavation and field screening at ARA-12, followed by selective excavation based upon field screening results.
 - Field screening will be performed again to verify that residual contamination is below the remedial action goals, followed by confirmation surveying and sampling for the final closure survey.
 - Decontaminate equipment.

Mobilize to ARA-23.

Excavation and soil removal at ARA-23 will proceed as detailed previously in Section 3.6. The excavation at ARA-23 will also be sequenced due to the large size of the site. The areas encompassed by the ARA-I and ARA-II facility boundaries and the haul road will be treated as separate excavation areas, and the remainder of ARA-23 will be divided into several smaller plots approximately 10 acres in size. Initial excavation of the designated areas within ARA-23 will proceed in a predetermined sequence as dictated by prevailing wind directions, followed by field screening. Selective excavation will be performed to remove hot spots, followed by additional field screening measurements to verify that

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residual contamination is below the remedial action goal. The final status survey and confirmation sampling will be performed on each plot at ARA-23 as the excavations are completed. Final survey sample analyses for all WAG 5 CERCLA sites will be performed by an INEEL-approved and -qualified laboratory.

If analytical results from ARA-01 or ARA-12 are returned while excavation of ARA-23 is ongoing, and it is determined that further excavation is necessary at any one of the sites, then a minimal amount of equipment and manpower will be deployed from ARA-23 to address the excavations at the other sites. It is anticipated, however, that the comprehensive process of excavation and field screening, combined with smart work practices (i.e., working from clean to dirty, frequent equipment survey and decontamination, as necessary) will eliminate the need to revisit any of the sites after the final status surveys have been performed.

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4. PATH FORWARD

The primary objective of the WAG 5 Phase II remedial action is to remove all contaminated material from the three CERCLA sites that exceed the remedial action goals. A constraint on the removal action is to minimize the amount of clean material that is excavated and disposed. An iterative process of selective excavation followed by field screening, special consideration for large rock, and a well defined procurement strategy have been outlined here to provide the framework for meeting the OU 5-12 remedial action objectives. The efficiency of the soil removal will be dependant upon several factors including, but not limited to the following:

- Accuracy of characterization data
- Sensitivity and accuracy of field screening technologies
- Equipment used for soil excavation and removal
- Methods of soil removal employed.

Each of these is a primary factor that will weigh on the efficiency of the soil removal and volume minimization. At this point, it is unclear which factor is the most critical; however, an evaluation of the soil removal methodology will be conducted during and after the soil removal.

Continuous evaluation of new technologies that may increase the efficiency of the soil removal action has been conducted at the INEEL to support the soil minimization strategy. This includes innovative soil removal/excavation methods and field screening technologies.

4.1 Technology Evaluation

Performance testing and characterization of the GPRS and the aboveground HPGe gamma-ray spectrometer was conducted during the summer of 2002. These measurement systems were calibrated and characterized to optimize their use in support of the soil removal action. Continuous evaluation of technologies applicable to field screening for toxic metals and radionuclides has been performed to ensure the highest levels of precision and accuracy are achieved during the excavation, field screening, and final status surveys of the OU 5-12 CERCLA sites.

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5. REFERENCES

DOE-ID, 2000, Final Record of Decision for Power Burst Facility and Auxiliary Reactor Area, DOE/ID-10700, U.S. Department of Energy Idaho Operations Office, January 2000.

DOE-ID, 2003, Remedial Design/Remedial Action Work Plan, Phase II, for Waste Area Group 5 (Draft Final), DOE/ID-10798, Rev. 1, U.S. Department of Energy Idaho Operations Office, January 2003.